



CLARK COUNTY HEALTH DISTRICT

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

May 11, 1993

Reference: PR Docket 92-235

Donna Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, DC 20554

Dear Ms. Searcy:

In response to the FCC Notice of Proposed Regulations for Land Mobile Radio users, I wish to address the potential effect to the Health District's Emergency Medical Services (EMS) Communications System which operates within the 450 - 470 MHz bands.

Clark County, Nevada is approximately the same size, in square miles, as the State of New Jersey. A county-wide communications network for EMS extends radio coverage by means of mountaintop relay stations. All the relay sites are connected by microwave to a central console located in downtown Las Vegas. The area hospitals are tied to the console by telephone lines. Rural ambulance services, manned by volunteer Emergency Medical Technicians (EMT's) Intermediate EMT's and Paramedics utilize this communications system for medical direction, i.e. physician orders to provide medical care and facilitate patient transport to Las Vegas hospitals. In some cases, the volunteer services are located 60 - 90 miles from the closest hospital.

The FCC proposal to reduce power and antenna height is appropriate in a large urban area where multiple communication systems cause intermodulation interference and a high "noise floor". The new proposal should help to eliminate this problem and perhaps aid in frequency reuse. However, a reduction of power/antenna height would make the Clark County Radio System obsolete, as we depend on the higher wattage to connect rural communities with urban services.

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We strongly urge consideration be given to exempt rural and urban areas from PR Docket 92-235 when they do not have overloaded frequencies and, need high power to connect mountaintop repeaters that are more that 25 miles apart.

Thank you for the opportunity to comment on this proposal.

Sincerely,

EMERGENCY MEDICAL SERVICES

A handwritten signature in cursive script, appearing to read 'LaRue Scull', written in dark ink.

LaRue Scull
EMS Coordinator